

Beginning on or about July 22, 2010 and continuing to and including on or about March 20, 2018, in the Western District of Texas and elsewhere, the defendant,

**RICARDO ROBLES**

combined, conspired, confederated and agreed with others known and unknown to the Grand Jury to commit an offense, that is to knowingly devise and attempt to devise a scheme and artifice to defraud and to obtain money and property by means of material false and fraudulent pretenses, representations and promises, both by affirmative acts and by deceitful concealment of material facts, and the defendant and uncharged co-conspirators did transmit and caused to be transmitted by means of wire communication in interstate commerce certain writings, signals and sounds, including wire transfers of funds from accounts owned and controlled by the Company held at Bank A to accounts owned and controlled by sham companies held at Banks B, C and D.

**Scheme and Artifice to Defraud**

In furtherance of the conspiracy to defraud and to further the objectives of the conspiracy, it was part of the scheme and artifice to defraud that:

1. Defendant, **RICARDO ROBLES**, on or about July 22, 2010, by himself or through a third party, registered a corporation, hereinafter the "Pass-Through", that he used to further his unlawful scheme.
2. Defendant, **RICARDO ROBLES**, with the assistance of his co-conspirators, created numerous sham companies which he used to inflate the cost of goods to the Company.
3. Defendant, **RICARDO ROBLES**, with the assistance of his co-conspirators, arranged for the sham companies to purchase goods from suppliers and then, through his employment with the Company, arranged for the Company to purchase those same goods at an inflated price.
4. Defendant, **RICARDO ROBLES**, then arranged for payment to be made by the Company to the sham companies, after which he would then divert a portion of those payments to the Pass-Through for his own personal use. These payments were made from accounts owned and controlled by the Company located at Bank A to accounts owned and controlled by the sham companies at Banks B, C and D;
5. Defendant, **RICARDO ROBLES**, concealed from the Company his involvement in arranging for the purchase of the goods by the sham companies and concealed from the Company his personal and business relationships with the purported owners of the sham companies.

All in violation of Title 18, United States Code, Sections 1343 and 1349.

**COUNTS TWO THROUGH TWENTY-ONE**  
**(18 U.S.C. §§ 1343)**  
**(Wire Fraud)**

The Introduction and the Scheme and Artifice to Defraud alleged in Count One of this Indictment are incorporated by reference in their entirety as if fully re-alleged herein.

Beginning on or before September 16, 2016 and continuing to and including on or about March 13, 2018, that is, on or about the dates alleged below, in the Western District of Texas, and elsewhere, defendant,

**RICARDO ROBLES,**

did devise and attempt to devise a scheme and artifice to defraud and to obtain money and property from his employer, the Company, by means of material false and fraudulent pretenses, representations and promises, both by affirmative acts and by deceitful concealment of material facts, and for the purpose of executing the scheme described above, and attempting to do so, the defendant caused to be transmitted by means of wire communication in interstate commerce certain writings, signals and sounds described below for each count, each transmission constituting a separate count:

<b>COUNT NUMBER (CT. #)</b>	<b>RECEIVING BANK ACCT.</b>	<b>SHAM COMPANY RECEIVING TRANSFER</b>	<b>DATE</b>	<b>AMOUNT</b>
<b>CT.# 2</b>	Bank C	Sham Company 1	September 16, 2016	\$15,163.00
<b>CT.# 3</b>	Bank C	Sham Company 1	September 23, 2016	\$13,409.60
<b>CT.# 4</b>	Bank C	Sham Company 1	September 30, 2016	\$12,367.60

<b>CT.# 5</b>	Bank D	Sham Company 2	October 14, 2016	\$11,433.50
<b>CT.# 6</b>	Bank C	Sham Company 1	October 21, 2016	\$29,650.50
<b>CT.# 7</b>	Bank D	Sham Company 2	October 21, 2016	\$11,452.75
<b>CT.# 8</b>	Bank D	Sham Company 2	October 28, 2016	\$11,424.50
<b>CT.# 9</b>	Bank D	Sham Company 2	November 4, 2016	\$11,418.75
<b>CT.# 10</b>	Bank C	Sham Company 1	December 16, 2016	\$12,245.00
<b>CT.# 11</b>	Bank C	Sham Company 3	August 4, 2017	\$22,385.60
<b>CT.# 12</b>	Bank C	Sham Company 3	September 14, 2017	\$23,351.80
<b>CT.# 13</b>	Bank C	Sham Company 3	November 16, 2017	\$35,999.47
<b>CT.# 14</b>	Bank C	Sham Company 3	November 30, 2017	\$20,922.20
<b>CT.# 15</b>	Bank B	Sham Company 4	December 21, 2017	\$64,495.45
<b>CT.# 16</b>	Bank B	Sham Company 4	February 1, 2018	\$45,767.10
<b>CT.# 17</b>	Bank B	Sham Company 4	February 8, 2018	\$53,950.72
<b>CT.# 18</b>	Bank C	Sham Company 3	February 15, 2018	\$21,603.18
<b>CT.# 19</b>	Bank B	Sham Company 4	March 1, 2018	\$48,195.37
<b>CT.# 20</b>	Bank B	Sham Company 4	March 8, 2018	\$49,465.81
<b>CT.# 21</b>	Bank D	Sham Company 2	March 13, 2018	\$14,297.60

All in violation of Title 18 United States Code, Section 1343.

**NOTICE OF GOVERNMENT'S DEMAND FOR FORFEITURE**

**[See Fed. R. Crim. P. 32.2]**

**I.**

**Wire Fraud & Conspiracy to Commit Wire Fraud Violations and Forfeiture Statutes**

**[Title 18 U.S.C. §§ 1343, 1349, subject to forfeiture pursuant to Title 18 U.S.C. § 981(a)(1)(C), as made applicable to criminal forfeiture by Title 28 U.S.C. 2461(c)]**

As a result of the criminal violations set forth in Counts One through Twenty-One, the United States of America gives notice to Defendant **RICARDO ROBLES** of its intent to seek the forfeiture of certain properties upon conviction and pursuant to FED. R. CRIM. P. 32.2 and Title 18 U.S.C. § 981(a)(1)(C), as made applicable to criminal forfeiture by Title 28 U.S.C. § 2461(c). Title 18 U.S.C. § 981(a)(1)(C) states in pertinent part:

**Title 18 U.S.C. § 981. Civil Forfeiture**

(a)(1) The following property is subject to forfeiture to the United States:

\* \* \*

(C) Any property, real or personal, which constitutes or is derived from proceeds traceable to a violation . . . of this title or any offense constituting "specified unlawful activity" (as defined in section 1956(c)(7) of this title), or a conspiracy to commit such offense.

Wire Fraud is an offense constituting "specified unlawful activity" as defined in section 1956(c)(7).

This Notice of Demand of Forfeiture includes but is not limited to the property described in Paragraph III.

**III.**

**Money Judgment**

A sum of money that represents the proceeds which constitute or are derived from proceeds traceable to the violations set forth in the Indictment for which Defendant **RICARDO ROBLES** is liable.

**Substitute Assets**

If any of the above properties, as a result of any act or omission of the Defendant:

- a. cannot be located upon the exercise of due diligence;

- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States to seek forfeiture, pursuant to Title 21 U.S.C. § 853(p) and Fed. R. Crim. P. 32.2, of any other property (substitute assets) of the Defendant up to the value of the forfeitable properties.

A TRUE BILL  
ORIGINAL SIGNATURE  
REDACTED PURSUANT TO  
E-GOVERNMENT ACT OF 2002

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FOREPERSON OF THE GRAND JURY

ASHLEY C. HOFF  
UNITED STATES ATTORNEY

By:

  
Assistant United States Attorney